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BEFORE THE ARIZONA STATE BOARD OF PHARMACY

In the Matter of

KAREN LIEB

Holder of License No. 8619
For the Practice of Pharmacy
In the State of Arizona

07-0031-HC.

**CONSENT AGREEMENT
FOR REINSTATEMENT OF
LICENSE AND PROBATION**

RECITALS

In the interest of a prompt and judicious settlement of this case, consistent with the public interest, statutory requirements and the responsibilities of the Arizona State Board of Pharmacy ("Board") and under A.R.S. §§ 32 1901, *et. seq.* and 41 1092.07(F)(5), Karen Lieb ("Respondent"), holder of Pharmacist License Number 8619 in the State of Arizona, and the Board enter into the following Recitals, Findings of Fact, Conclusions of Law and Order ("Consent Agreement") as a final disposition of this matter.

1. Respondent has read and understands this Consent Agreement and has had the opportunity to discuss this Consent Agreement with an attorney, or has waived the opportunity to discuss this Consent Agreement with an attorney.

2. Respondent understands that she has a right to a public administrative hearing concerning the above-captioned matter, at which hearing he could present

1 evidence and cross examine witnesses. By entering into this Consent Agreement,
2 Respondent knowingly and voluntarily relinquishes all rights to such an administrative
3 hearing, as well as rights of rehearing, review, reconsideration, appeal, judicial review or
4 any other administrative and/or judicial action, concerning the matters set forth herein.

5 3. Respondent affirmatively agrees that this Consent Agreement shall be
6 irrevocable.

7 4. Respondent understands that this Consent Agreement or any part of the
8 agreement may be considered in any future disciplinary action by the Board against her.

9 5. Respondent understands this Consent Agreement deals with Board Case
10 No. 8619 involving allegations of unprofessional conduct against Respondent. The
11 investigation into these allegations against Respondent shall be concluded upon the
12 Board's adoption of this Consent Agreement.

13 6. Respondent understands that this Consent Agreement does not constitute a
14 dismissal or resolution of any other matters currently pending before the Board, if any,
15 and does not constitute any waiver, express or implied, of the Board's statutory authority
16 or jurisdiction regarding any other pending or future investigation, action or proceeding.

17 7. Respondent also understands that acceptance of this Consent Agreement
18 does not preclude any other agency, subdivision, or officer of this State from instituting
19 any other civil or criminal proceedings with respect to the conduct that is the subject of
20 this Consent Agreement.

21 8. All admissions made by the Respondent in this Consent Agreement are
22 made solely for the final disposition of this matter, and any related administrative pro-
23 ceedings or civil litigation involving the Board and Respondent. Therefore, any admis-
24 sions made by Respondent in this Consent Agreement are not intended for any other use,
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1 such as in the context of another regulatory agency's proceedings, or civil or criminal
2 proceedings, whether in the State of Arizona or in any other state or federal court.

3 9. Respondent acknowledges and agrees that, upon signing this Consent
4 Agreement and returning this document to the Board's Executive Director, she may not
5 revoke her acceptance of the Consent Agreement or make any modifications to the
6 document regardless of whether the Consent Agreement has been signed by the Execu-
7 tive Director. Any modification to this original document is ineffective and void unless
8 mutually agreed by the parties in writing.

9 10. Respondent understands that the Consent Agreement shall not become
10 effective unless and until adopted by the Board and signed by its Executive Director.

11 11. If a court of competent jurisdiction rules that any part of this Consent
12 Agreement is void or otherwise unenforceable, the remainder of the Consent Agreement
13 shall remain in full force and effect.

14 12. Respondent understands and agrees that if the Board does not adopt this
15 Consent Agreement, she will not assert as a defense that the Board's consideration of this
16 Consent Agreement constitutes bias, prejudice, prejudgment or other similar defenses.

17 13. Respondent understands that this Consent Agreement is a public record that
18 may be publicly disseminated as a formal action of the Board and may be reported as
19 required by law to the National Practitioner Data Bank and the Healthcare Integrity and
20 Protection Data Bank.

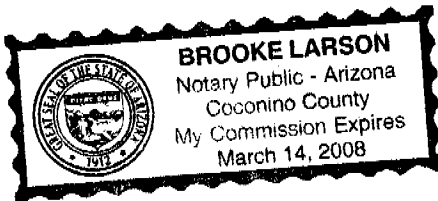
21 14. Respondent understands that any violation of this Consent Agreement
22 constitutes unprofessional conduct and may result in disciplinary action. A.R.S. §§ 32-
23 1901.01(B)(20), -1927(A)(1).

1 ACCEPTED AND AGREED BY RESPONDENT

2 Karen Lieb
3 Karen Lieb

Dated: 12/30/06

4 Subscribed and sworn to before me in the County of Coconino, State of Arizona,
5 this 30 day of December, 2006, by Karen Lieb.



Brooke Larson
9 NOTARY PUBLIC

My Commission expires: 03-14-2008

10 **FINDINGS OF FACT**

11 1. The Arizona State Board of Pharmacy ("Board") is the duly constituted
12 authority for licensing and regulating the practice of pharmacy in the State of Arizona.

13 2. Karen Lieb ("Respondent") is the holder of license number 8619 to
14 practice as a pharmacist in the State of Arizona.

15 3. On November 9, 2000, the Board voted to revoke Respondent's license
16 to engage in the practice of Pharmacy in case No. 99-0032-PHR.

17 4. Respondent had previously entered into a PAPA agreement on January
18 13, 2000, but failed to comply with the terms of that agreement.

19 5. Respondent entered into a PAPA agreement on June 20, 2006 with a
20 scheduled end date of June 20, 2011.

21 6. Respondent appeared before the Board again on November 8, 2006 to
22 request that her license be reinstated. The Board voted to reinstate Respondent's license
23 at that time with certain terms and conditions.

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- 1 c. Respondent shall advise the Board immediately of any change in
2 pharmacy employment status throughout the term of his probation.
3 d. Respondent shall furnish the Board with a list of all jurisdictions in
4 which he maintains or has maintained licensure in the profession of
5 pharmacy along with the registration numbers of said licenses.
6 e. Respondent shall obey all federal and state laws and rules governing
7 the practice of pharmacy.
8 f. Respondent shall appear before the Board at a regularly scheduled
9 meeting after the terms of probation are met to request that the probation
10 imposed by this Order be terminated. Respondent's failure to petition the
11 Board to terminate the probation shall extend the probation period.

12 DATED this 25 day of January, 2007

13 ARIZONA STATE BOARD OF PHARMACY

14 (Seal)

15 By:



16 HAL WAND, R.Ph.
17 Executive Director
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RECEIVED

JAN 3 2007

ARIZONA STATE
BOARD OF PHARMACY

1 ORIGINAL OF THE FORGOING FILED
2 this _____ day of _____ 2007 with:

3 Arizona State Board of Pharmacy
4 4425 W. Olive Avenue, Suite 140
5 Glendale, Arizona 85302

6 EXECUTED COPY OF THE FOREGOING MAILED
7 BY REGULAR MAIL

8 this _____ day of _____ 2007 to:

9 Karen Lieb
10 515 E. Bennett Drive
11 Flagstaff, Arizona 86001

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